

Exhibit A

N-Tron Corp. v. Nicholson, et al., Case No. 12 Civ. 3568 (GBD)(GWG) (S.D.N.Y.)

PLAINTIFF'S DEPOSITION DESIGNATIONS; DEFENDANTS' OBJECTIONS AND COUNTER-DESIGNATIONS; PLAINTIFFS' OBJECTIONS AND REBUTTAL DESIGNATIONS										
Deponent	Date	Designations		Objection(s)	Counter-Designations		Objection(s)	Rebuttal Designations		Objection(s)
		Start	End		Start	End		Start	End	
Ann Marie Monahan	4/17/2014	9:2	9:4		42:13	42:24	FD, AF	53:18	54:7	Foundation, Lack of personal or firsthand knowledge, Speculation
		9:11	9:13		43:2	43:3				Speculation, Vague and Ambiguous, Unresponsive Answer, Asked and Answered
		11:16	13:21		43:5	43:18	FD, AF	54:16	55:1	
		14:23	15:3		44:5	45:1	N			
		16:1	16:12		45:13	47:9	N			
		16:18	16:19		47:11	48:5				
		18:19	19:15		48:8	48:20				
		24:12	25:3		48:23	49:3				
		25:21	25:25		54:13	54:15				
		26:7	27:9		123:21	124:1				
		27:15	29:2		128:13	128:17				
		34:19	35:7	(35: 8-12) Part of question deleted	131:9	131:11				
		35:13	35:17	Foundation, lack of personal or firsthand knowledge; Opinion testimony; Unresponsive answer; Speculation	135:20	136:1				
		35:21	35:21	Foundation, lack of personal or firsthand knowledge; Opinion testimony; Unresponsive answer; Speculation	136:7	136:24				
		43:11	43:18	Foundation, lack of personal or firsthand knowledge; Opinion testimony; Speculation	151:19	152:8				
		60:10	60:17		179:2	179:19	AA			
		61:15	61:20							
		61:23	62:8							
		64:17	64:20							
		68:22	69:12							

PLAINTIFF'S DEPOSITION DESIGNATIONS; DEFENDANTS' OBJECTIONS AND COUNTER-DESIGNATIONS; PLAINTIFFS' OBJECTIONS AND REBUTTAL DESIGNATIONS											
Deponent	Date	Designations		Objection(s)	Counter-Designations		Objection(s)	Rebuttal Designations		Objection(s)	Objection(s)
		Start	End		Start	End		Start	End		
		69:14	70:2								
		70:4	70:9								
		70:11	70:13	Unresponsive answer							
		70:25	71:2								
		71:13	72:4								
		74:4	74:14								
		74:25	75:4								
		75:7	75:14								
		75:17	75:17								
		75:19	75:20								
		76:16	77:7								
		89:15	89:16								
		90:1	90:6								
		90:13	90:16								
		95:7	95:11								
		96:18	97:14								
		97:17	97:24								
		110:2	110:6								
		110:15	110:18								
		111:5	111:6								
		113:15	113:19								
		113:22	114:1								
		123:9	123:20	Foundation, lack of personal or firsthand knowledge; Opinion testimony; Speculation							
		124:8	125:3	Foundation, lack of personal or firsthand knowledge; Opinion testimony; Speculation; Question assumes fact(s) not in evidence or contrary to evidence; Leading question							
		125:9	126:11	(126: 8-11) Speculation; Question assumes fact(s) not in evidence or contrary to evidence; Leading question; Argumentative question							

PLAINTIFF'S DEPOSITION DESIGNATIONS; DEFENDANTS' OBJECTIONS AND COUNTER-DESIGNATIONS; PLAINTIFFS' OBJECTIONS AND REBUTTAL DESIGNATIONS											
Deponent	Date	Designations		Objection(s)	Counter-Designations		Objection(s)	Rebuttal Designations		Objection(s)	Objection(s)
		Start	End		Start	End		Start	End		
		127:2	127:12	Foundation, lack of personal or firsthand knowledge; Opinion testimony; Speculation							
		128:1	128:4	Foundation, lack of personal or firsthand knowledge; Opinion testimony; Speculation							
		128:9	128:12	(128: 9-12) Foundation, lack of personal or firsthand knowledge; Opinion testimony; Speculation; Leading question							
		128:18	129:4	Foundation, lack of personal or firsthand knowledge; Opinion testimony; Speculation							
		129:10	130:3								
		130:20	131:8								
		132:11	132:13	Leading question; Asked and answered; Vague and ambiguous; Argumentative question; Foundation, lack of personal or firsthand knowledge							
		132:15	132:15	Leading question; Asked and answered; Vague and ambiguous; Argumentative question; Foundation, lack of personal or firsthand knowledge							
		134:7	134:23	Foundation, lack of personal or firsthand knowledge; Opinion testimony; Speculation							

PLAINTIFF'S DEPOSITION DESIGNATIONS; DEFENDANTS' OBJECTIONS AND COUNTER-DESIGNATIONS; PLAINTIFFS' OBJECTIONS AND REBUTTAL DESIGNATIONS											
Deponent	Date	Designations		Objection(s)	Counter-Designations		Objection(s)	Rebuttal Designations		Objection(s)	Objection(s)
		Start	End		Start	End		Start	End		
		135:1	135:19	Foundation, lack of personal or firsthand knowledge; Opinion testimony; Speculation							
		136:2	136:6	Leading question							
		138:14	139:18	Leading question							
		140:17	141:24								
		142:7	142:25								
		143:3	143:14	(143: 5-9) Speculation; Asked and answered; Leading question; Argumentative question							
		143:20	143:23								
		144:10	144:13	Speculation; Foundation, lack of personal or firsthand knowledge; Opinion testimony; Leading question; Argumentative question; Question assumes fact(s) not in evidence or contrary to evidence							
		144:16	144:20	Speculation; Foundation, lack of personal or firsthand knowledge; Opinion testimony; Leading question; Argumentative question; Question assumes fact(s) not in evidence or contrary to evidence							
		144:24	145:4	Speculation; Foundation, lack of personal or firsthand knowledge; Opinion testimony; Leading question; Argumentative question; Question assumes fact(s) not in evidence or contrary to evidence							

PLAINTIFF'S DEPOSITION DESIGNATIONS; DEFENDANTS' OBJECTIONS AND COUNTER-DESIGNATIONS; PLAINTIFFS' OBJECTIONS AND REBUTTAL DESIGNATIONS											
Deponent	Date	Designations		Objection(s)	Counter-Designations		Objection(s)	Rebuttal Designations		Objection(s)	Objection(s)
		Start	End		Start	End		Start	End		
		146:24	147:22	Speculation; Foundation, lack of personal or firsthand knowledge; Opinion testimony							
		148:2	148:11	(148:8-11) Foundation, lack of personal or firsthand knowledge; Opinion testimony; Speculation; Leading question							
		148:21	149:4								
		149:12	149:25								
		150:4	150:19								
		150:24	151:18								
		152:9	153:14	(152: 9-18) Question assumes fact(s) not in evidence or contrary to evidence; Speculation; Foundation, lack of personal or firsthand knowledge; Opinion testimony							
		158:3	158:6	Speculation; Foundation, lack of personal or firsthand knowledge; Opinion testimony; Leading question; Vague and ambiguous							
		158:10	158:18	Speculation; Foundation, lack of personal or firsthand knowledge; Opinion testimony; Leading question; Unresponsive answer; Vague and ambiguous							
		163:2	163:22								
		164:13	165:15								
Amanda Strong	4/17/2014	6:16	6:18		30:11	30:19		55:5	55:10		

PLAINTIFF'S DEPOSITION DESIGNATIONS; DEFENDANTS' OBJECTIONS AND COUNTER-DESIGNATIONS; PLAINTIFFS' OBJECTIONS AND REBUTTAL DESIGNATIONS											
Deponent	Date	Designations		Objection(s)	Counter-Designations		Objection(s)	Rebuttal Designations		Objection(s)	Objection(s)
		Start	End		Start	End		Start	End		
		7:1	7:2		53:14	53:15	N				
		10:11	10:25		55:11	55:18					
		11:5	12:2		58:4	58:8					
		14:5	14:25		59:13	59:21					
		15:17	15:17								
		15:22	16:9								
		26:14	26:15								
		26:21	26:25								
		27:9	27:19								
		28:4	28:22								
		30:6	30:10								
		34:1	34:4								
		34:6	34:11								
		53:16	53:25								
		54:6	55:4	(54: 17-24) Leading questions							
		55:19	55:23								
		56:4	56:21								
		57:7	58:3	Leading questions							
		58:9	58:14	Speculation, Vague and ambiguous							
		59:4	59:12	Leading questions							
Warren Nicholson	9/12/2013	9:21	9:22		45: 10	45:11		65:20	65:21		
		16:24	17:14		45:15	45:20		70:6	70:21		
		18:20	19:5		45:23	45:24	FD, S	76:24	76:24		
		19:23	20:11		46:3	46: 12	FD, S	81:4	81:13		
		20:18	21:4		64:22	65:3		82:11	82:21		
		22:3	22:10	(44:9) Relevancy, Materiality	65:9	65:19		116:5	116:10		
		44:5	44:9	Relevancy, Materiality, Question assumes fact(s) not in evidence or contrary to evidence	66:11	66:18		125:6	125:10		
		44:12	45:5		67:17	68:18	FD	129:19	130:8		
		45:9	45:9	Relevancy, Materiality, Question assumes fact(s) not in evidence or contrary to evidence	68:24	69:25	FD	134:18	134:21		
		45:12	45:14	Relevancy, Materiality, Question assumes fact(s) not in evidence or contrary to evidence	70:22	71:5		136:23	137:17		

PLAINTIFF'S DEPOSITION DESIGNATIONS; DEFENDANTS' OBJECTIONS AND COUNTER-DESIGNATIONS; PLAINTIFFS' OBJECTIONS AND REBUTTAL DESIGNATIONS												
Deponent	Date	Designations		Objection(s)	Counter-Designations		Objection(s)	Rebuttal Designations		Objection(s)		
		Start	End		Start	End		Start	End			
		52:10	52:12		74:17	76:23	FD, S, Inc.	138:10	138:22			
		63:21	64:1		77:7	78:10		146:17	147:1			
		64:6	64:21		80:24	81:3		151:1	151:4			
		65:4	65:8		81:20	82:6		151:18	152:18			
		65:22	66:10		85:23	86:10		153:19	154:16			
		73:17	74:5		89:5	91:19	FD, S	155:11	155:16			
		79:5	79:9		92:16	92:24		157:20	158:6			
		80:3	80:5		93:5	93:24		159:17	160:4			
		80:17	80:23		115:23	116:4		162:10	162:16			
		82:22	83:1		124:6	124:18		164:18	164:22			
		84:24	85:9		127:10	127:20		172:16	172:20			
										Argumentative Question, Speculation, Question assumes fact(s) not in evidence or contrary to evidence		
		85:13	85:22		128:11	128:15		173:8	173:13			
		110:14	111:25		129:5	129:12		173:24	174:3			
		112:25	113:5		134:3	134:17		174:10	174:17	Relevancy, Materiality		
		113:10	113:23		136:6	136:22		174:24	175:2			
		113:25	114:10		137:18	138:9	MC, FD	175:11	175:23			
		114:14	114:18		138:15	139:3		178:21	178:23			
										Relevancy, Materiality, Argumentative Question, Speculation, Legal Conclusion		
		115:10	115:22		139:21	140:2		180:14	180:23			
										Argumentative Question, Legal Conclusion		
		116:11	116:24		140:8	140:17		188:4	188:20			
		117:14	118:3		142:7	142:24		190:14	190:14			
		118:19	119:4		143:6	144:17		271:5	271:21			
		122:12	122:24		145:11	145:16		271:24	272:5			
		123:5	124:5		146:6	146:16		273:1	273:3			
		124:23	125:2		147:20	147:22	C	295:6	295:10			
		125:5	125:5		148:9	148:11	C					
		125:11	126:8		149:17	149:24						
		127:21	128:10		150:4	150:18						
		128:16	128:24		154:17	155:3						
		129:15	129:18		158:11	159:16						
		130:9	130:16		160:9	161:8	R					
		131:20	132:8		161:19	162:9						
		133:7	133:12		164:3	164:17						
		133:17	134:2		164:23	165:5						
		134:22	134:24		166:17	167:16	H, FD					
		135:2	135:19		168:4	168:14	H, FD					
		139:4	139:19		169:11	169:15						

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Deponent	Date	Designations		Objection(s)	Counter-Designations		Objection(s)	Rebuttal Designations		Objection(s)	Objection(s)
		Start	End		Start	End		Start	End		
		140:18	141:22		169:25	170:8					
		145:3	145:10		170:12	170:16					
		162:21	164:2		175:3	175:10					
		169:16	169:24		178:10	178:20	H				
		170:9	170:11		180:9	180:13	R, R403				
		172:8	172:15		181:11	181:13					
		172:21	172:25		183:11	183:22					
		173:3	173:3		184:10	184:16					
		173:7	173:7		187:7	188:3	R, R403				
		174:18	174:23		189:5	189:8					
		176:4	176:10		189:11	190:11	Inc.				
		176:22	177:6		192:13	192:18					
		177:11	177:18		192:22						
		179:18	179:23		192:25	194:9					
		180:2	180:8		195:1	195:10	R, R403				
		180:24	181:10		195:17	195:21					
		181:14	181:23		196:14	197:12					
		182:6	182:12		214:13	214:16					
		183:23	184:3		216:12	216:17					
		184:21	184:23		216:20	217:6	Nonresponsive				
		184:25	185:18		220:1	220:2					
		186:9	187:5		220:5	220:8					
		188:21	188:22		220:13						
		188:25	189:4		244:15	245:8					
		190:3	190:9		246:20	246:21					
		190:15	190:22		248:18	249:3					
		191:8	191:23		270:22	270:25					
		192:4	192:12	Relevancy, Materiality	274:5	274:12					
		195:11	195:16	Relevancy, Materiality	290:12	290:14					
		195:22	196:23	Relevancy, Materiality	290:17	290:21					
		209:13	209:19		293:9	293:25					
		214:3	214:7		294:11	295:5					
		214:10	214:11								
		214:17	215:1								
		215:4	215:4								
		215:8	215:11								
		215:17	215:25								
		220:14	220:17								
		220:20	220:25								
		221:3	221:8								
		221:11	221:13								
		221:16	221:21								
		221:24	221:25								

PLAINTIFF'S DEPOSITION DESIGNATION OBJECTION CODES

The following codes are used in Plaintiff's objections to Defendants' deposition designations and rebuttal designations, as well as in Plaintiff's objections to Defendants' counterdesignations:

Abbreviation	Objection
A	Authenticity
AA	Asked and Answered
AF	Assumes Facts Not in Evidence
FmA	Form, Argumentative
FmC	Form, Compound
FmL	Form, Leading
FmV	Form, Vague
FD	Foundation
H	Hearsay
Inc	Incomplete designation
IO	Improper Opinion testimony by lay witness under F.R.E. 701 and 702.
LC	Legal Conclusion
MC	Mischaracterization
N	Narrative, Attorney Statement/Colloquy
P	Privileged
R	Relevancy (F.R.E. 401; 402)
S	Calls for Speculation
R32	Violates F.R.C.P 32
R403	Unduly Prejudicial (F.R.E. 403)
C	Character Evidence (F.R.E. 404(b))
OS	Outside scope of 30(b)(6) topics OR plaintiff's designations
ROC	Rule of Completeness
W	Waiver of objection